

**IN THE U.S. DISTRICT COURT OF MARYLAND
FOR DISTRICT OF MARYLAND**

Todd Feehley, et al.
*on behalf of themselves and
others similarly situated*

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Plaintiffs

*

v.

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Case No. TJS-17-02591

Sabatino's, Inc.
(t/a "Sabatino's Italian Restaurant), et al.

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Defendants

/

JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT

The parties jointly move that the Court approve the attached settlement agreement (Ex. 1). In support of this Motion, the parties state as follows:

1. The parties conducted a full exchange of information, including payroll records, prior to engaging in settlement discussions.

2. The settlement agreement was reached in mediation before Magistrate Judge Timothy J. Sullivan on February 19, 2019. Each side was capably represented by experienced counsel.

3. The settlement agreement provides for a total payment of \$97,285.90 to the eleven (11) Plaintiffs, which represents 100% of their disputed wages, and an additional payment \$48,641.13 for the Plaintiffs' attorneys' fees and costs, which represents less than 100% of the accrued attorneys' fees plus their actual costs. The Plaintiffs have not been (and will not be) required to pay any of the attorneys' fees and costs in this case.

4. The settlement agreement reached is reasonable and fair, considering the facts and issues in controversy. The Court is fully aware of the fact and legal issues, having presided over the settlement negotiations.

March 11, 2019

Respectfully submitted,

/s/ (with permission)

/s/ (with permission)

Howard B. Hoffman, Bar No.: 25965
Jordan S. Liew, Bar No.: 20509
Hoffman Employment Law, LLC
600 Jefferson Plaza, Suite 204
Rockville, MD 20852
301-251-3752 Telephone
301-251-3753 Facsimile
hbhoffmanesq@hoholaw.com

T. Christine Pham, Bar No.: 25446
Rosenberg Martin Greenberg, LLP
25 South Charles Street, Suite 2115
Baltimore, MD 21201
410.727.6600 Telephone
410.727.1115 Facsimile
cpham@rosenbergmartin.com

/s/ Bradford W. Warbasse

Attorneys for Defendants
Sabatino's, Inc. and Vincent Culotta

Bradford W. Warbasse, Esquire
Federal Bar No. 07304
401 Washington Ave., Suite 200
Towson, MD 21204
410-337-5411 Telephone
410-938-8668 Facsimile
warbasselaw@gmail.com

Attorneys for Plaintiffs

APPROVED:

Hon. Timothy J. Sullivan
U.S. Magistrate Judge

Date

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of March, 2019, a copy of the foregoing Joint Motion to Approve Settlement Agreement, along with all Exhibits and other attachments, was filed via the Electronic Case Filing System (ECF) maintained by the U.S. District Court for the District of Maryland, and is available for viewing and downloading from the ECF system.

_____/s/_____
Bradford W. Warbasse